

UNITED STATES DISTRICT COURT in NORTHERN DISTRICT OF CALIFORNIA

Hang Zhang,

Plaintiff,

v.

DANIEL DRISCOLL,

Secretary, Department of the Army,

Defendant

Case No. 3:25-cv-03381-LJC

(AFL-CIO v. OPM, No. 3:25-cv-01780-WHA)

April 28, 2025

VIA ECF AND HAND DELIVERY

Clerk of Court

United States District Court

Northern District of California

450 Golden Gate Avenue

San Francisco, CA 94102

Re: Hang Zhang v. Daniel Driscoll, Department of the Army

Case No. 3:25-cv-03381-LJC — Administrative Motion to Consider Whether Cases
Should Be Related

Dear Clerk:

Please accept for filing the enclosed documents, which supersede the versions submitted on
April 27, 2025. Revisions are limited to caption corrections and consistent exhibit cross-
references (Exhibits A–J).

Enclosures:

1. Administrative Motion to Consider Whether Cases Should Be Related (Civ. L.R. 3-12)
2. [Proposed] Order Relating Cases

1 3. Motion for Preliminary Injunction

2 4. [Proposed] Order for Preliminary Injunction

3 5. Declaration

4 6. Consolidated Exhibits

5 7. Certificate of Service

6
7 Kindly strike the earlier motion or mark it “superseded.”

8
9 Respectfully submitted,

10
11 /s/ Hang Zhang

12 Hang Zhang | hangzhang777@yahoo.com

13 Defense Language Institute, Department of the Army